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To: Microsoft ATR
Date: 12/13/01 6:46am
Subject: One addition to the Microsoft remedy

I very much liked and agreed with Dan Kegel's analysis of the proposed Microsoft remedies. His edits of the proposed remedies are available at <http://www.kegel.com/remedy.html>. What follows is a description and justification for one additional remedy.

Bundling Internet Explorer into the Microsoft Windows operating system is not the central cause of Microsoft's ability to control the desktop. The non-disclosure of the file formats used by Microsoft Office is the key factor in the ability of Microsoft to retain monopoly control of the desktop. Ownership of the file format essentially makes Microsoft a co-owner of the contents of those files. Even the Federal government is held hostage to Microsoft by the secrecy of these file formats. Eliminating Microsoft's control over the content will eventually lead to the creation of a more competitive market. The disclosure of the file formats will enable alternative office suites, such as StarOffice, OpenOffice, and KWord to enter an open market for office document processing.

The Microsoft Office tools have been designed as an easy to learn and use starting point for creating content used in the business process. For many business activities the creation of the data is just one step in a workflow process. The Microsoft non-disclosure policy, that allows them to maintain their vice like grip on the users, has harmed their customers by limiting the ways in which user can access the data contained in the documents to only those methods which are approved by Microsoft. The Microsoft .NET proposal will work to exploit this situation by extending control over a larger portion of the workflow within organizations. This next exploitation will be enabled if the injustice of the Microsoft non-disclosure policy is allowed to continue. Unlocking the content of the documents produced by Microsoft Office, by requiring a full disclosure and cooperation in the definition of the format, will enable alternate workflows to make use of the document contents, such as post-processing by tools such as Python, Perl, and XSTL.

The inequity of the non-disclosure policy to the customers of Microsoft Office can be eliminated by requiring full disclosure of the file format. Given the Microsoft track record, the disclosure must be supported with evidence and tools that demonstrate that the disclosure is honest and correct. This can only be done by providing software that proves the disclosure to be correct. This is a punishment for the crime committed by Microsoft, so the fix should not entail additional costs to the end user. The cost to Microsoft to produce the documentation and software would be insignificant relative to their income off of the Office product. The following set of requirements for the file format disclosure are required in order to keep Microsoft from obstructing the free use of the content of the files. The interoperability with OpenOffice is particularly important to the

end user. A more detailed justification for the terms can be provided if necessary.

An Additional Term for the Remedy

Within six months of the final settlement Microsoft will release bi-directional translators that move data between the Microsoft Office native file formats for PowerPoint, Word, and Excel and a documented XML file format. The mapping must follow the architecture used in OpenOffice as closely as possible. This includes the separation of bitmapped pictures into separate files and the use of zip to compress the resulting collection of files. The element and attribute names of OpenOffice should also be used, unless a rationale for non-conformance is provided. The translators will be made available for all versions of Microsoft Office dating back to Office95. The translators will be made available for free download over the Internet. The translators will not require the installation of Microsoft Office on the system on which the translators are present. The translators must support a simple command line interface that specifies the input file name and the output file name. No GUI based interaction should be required when the command line is used. No external applications will be launched by the translator application. No licensing restrictions will be made on the translators. A W3C XML schema (XSD) that precisely defines the constraints on the elements and attributes of the file format must be supplied with each translators. Documentation describing the function of each element and attribute in the schema must be supplied. The W3C XML schema (XSD) and the documentation must be approved by an oversight committee. The bi-directional translators must demonstrate round-robin testing of any Microsoft Office document without loss of data. When a document is read back into Office from the XML file and the document is written out to the file a second time the order and content of the elements and attributes must remain unaltered. The XML file must conform to the canonical XML file format. The correctness and completeness of the translators will be assessed by an independent court appointed oversight committee. The source code for the translators must be made available under terms compatible with Open Source Software.

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